

BARRY J. PORTMAN
Federal Public Defender
CYNTHIA C. LIE
Assistant Federal Public Defender
160 West Santa Clara Street, Suite 575
San Jose, CA 95113
Telephone: (408) 291-7753
Counsel for Defendant LEON

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR 09-00198 JW
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER EXTENDING VOLUNTARY
vs.)	SURRENDER DATE
)	
VIDAL LEON,)	
)	
Defendants.)	
)	

STIPULATION

The parties, by and through their respective counsel, hereby stipulate and agree that the date set for Vidal Leon's surrender for service of his sentence may be extended from April 13, 2010, to April 27, 2010. The reason for the requested extension is to accommodate Mr. Leon's plans to have his newborn daughter christened and the recently-discovered scheduling backlog at the family's church. United States Pretrial Services Officer Jaime Carranza has been consulted as to this request and has no objection, and defense counsel has communicated the proposed date and consequences of noncompliance to Mr. Leon.

Dated: March 24, 2010

s/_____
THOMAS M. O'CONNELL
Assistant United States Attorney

1 Dated: March 24, 2010

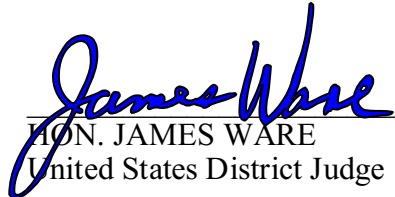
2 s/_____
3 CYNTHIA C. LIE
4 Assistant Federal Public Defender

5 ~~PROPOSED~~ **ORDER**

6 Good cause appearing and by stipulation of the parties, it is hereby ordered that the date
7 for defendant's voluntary surrender for service of his sentence shall be extended from Tuesday,
8 April 13, 2010, to Tuesday, April 27, 2010.

9 It is so ordered.

10 Dated: March 25, 2010

11 
12 HON. JAMES WARE
13 United States District Judge
14
15
16
17
18
19
20
21
22
23
24
25
26